

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA**

**JOHN J. BOSO and
TREVOR WILSON,**

Plaintiffs,

Civil No. 2:22-CV-00017(Kleeh)

v.

**G. RUSSELL ROLLYSON, JR.,
Deputy Commissioner of Delinquent and
Non-entered Lands of Pocahontas County, WV,
in his official and personal capacities,**

and

Sharon Zuckerman,

Defendants.

PLAINTIFF'S RULE 26(a)(1) DISCLOSURES

NOW COMES PLAINTIFFS, by counsel, Michael C Doss, pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, and discloses as follows:

A. **Pursuant to Rule 26(a)(3), Plaintiffs expect to call the following witness:**

1. Plaintiff -John J. Boso
2. Plaintiff-Trevor Wilson
3. Defendant-G. Russell Rollyson, Jr.
4. Defendant-Sharon Zuckerman
5. Representative of Pocahontas County Sheriff Tax Office
6. Representative of Pocahontas County Assessor Office
7. Representative of Pocahontas County Clerk Office
8. Plaintiff reserves the right to call any witness disclosed by any Defendants.
9. Plaintiff reserves the right to supplement this list as the identity of other witness becomes apparent through discovery.

B. **Pursuant to Rule 26(a)(3)(ii), Plaintiff expects to submit the following testimony by deposition only if the witness does not appear or is otherwise unavailable at trial:**

1. Sharon Zuckerman

C. **Pursuant to Rule 26(a)(3)(iii), Plaintiffs intend to introduce the following exhibits at trial:**

1. Deed and attachments thereto for subject real estate from Defendant, G. Russell Rollyson, Jr., to Defendant, Sharon Zuckerman, dated April 1, 2022 in Deed Book 400, at page 292.
2. 2019 Tax Receipt for the subject real estate.
3. 2020 Tax Receipt for the subject real estate.
4. Pocahontas County Assessor Map Card for the subject real estate.
5. Deed for subject real estate from Raymond K. Coleman, Jr. and Patricia A. Coleman to John J. Boso, dated June 21, 2019 in Deed Book 380, at page 485.
6. Copy of the Grantor Index for Deeds (Book) from County Clerk Office showing index of deed from Coleman to Boso.
7. Copy of the Grantee Index for Deeds (Book) from County Clerk Office showing index of deed from Coleman to Boso.
8. Copy of the Index (Computer) from County Clerk Office showing results for search in name of Raymond Coleman.
9. Copy of the Index (Computer) from County Clerk Office showing results for search name of Patricia Coleman.
10. Copy of the Index (Computer) from County Clerk Office showing results for search name of John Boso.
11. All letters sent by the Defendant, Sharon Zuckerman, to the Plaintiffs prior to filing of the complaint in this matter.
12. Plaintiffs intend to introduce any and all documents disclosed by the Defendants pursuant to Rule 26(a)(3)(iii).
13. Plaintiffs reserve the right to supplement this list if a document is discovered for the first time after this disclosure was prepared or any document necessary for rebuttal purposes.

**JOHN J. BOSO and
TREVOR WILSON,
PLAINTIFFS,
By Counsel,**

/s/ Michael C. Doss
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